

Appendix A

Permit Documents

Alternative Emission Reduction Plan (“Bubble”)
For Union Carbide Corporation, Taft Plant



MAIN FILE

DEQ - OES

original to LOAcopy to Rita/Gra/Dyer

PER 19870001

A 2007 FEB 23 PM 1:10
February 23, 2007

Union Carbide Corporation
The Dow Chemical Company
P.O. Box 50
355 Hwy. 3142 - Gate 28
Hahnville, La. 70057
USA

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Dr. Chuck Carr Brown
Assistant Secretary
Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

RE: Request to Rescind Bubble Permit 1836T(M-1)
Union Carbide Corporation, St. Charles Operations, St. Charles Parish
Agency Interest No. 2083

DEQ - OES
2007 FEB 27 PM 1:10

Dear Dr. Brown:

Union Carbide Corporation (UCC) is submitting this request to rescind the Bubble Permit 1836T (M-1). Effective December 19, 2006, the AP2 Plant ceased operations. The plant closing has eliminated the need for the bubble permit to cover the emissions associated with Tank 2635, EIQ 605. The Bubble permit was issued to allow the tank to operate without controls per LAC 33:III.2103. The Bubble Permit No. 1836T was originally issued March 31, 1983, revised April 23, 1987 as Bubble Permit No. 1836T(M-1) and again revised on May 5, 1990, 1836T(M-1). The permit included seven (7) tanks. All tanks except Tank 2635, EIQ 605 have subsequently been permitted in the Site Logistics Title Permit No. 2656-V0. Therefore, UCC requests rescinding of the Bubble Permit as Tank 2635 is no longer in service. The Bubble Permit was also adopted as part of the State Implementation Plan (SIP) in the Federal Register dated Wednesday, July 18, 1990 page 29203. UCC requests the SIP to be revised at the next revision date.

This letter also serves to inform DEQ that the annual emissions report required by the Bubble Permit will no longer be submitted. The last submittal was dated February 21, 2007. There no longer is any need for this report as the tank is no longer in service.

If you have any questions, please contact Eric Killian at (985) 783-4241. Please send all written correspondence directly to me.

Sincerely,

Sarah Thigpen
Responsible Care Leader

SBT/EMK/PLD

cc: Mr. Blaise Guzzardo - LDEQ/SERO - New Orleans
Ms. Barbara Jacob - St. Charles Parish Council



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO
GOVERNOR

MIKE D. McDANIEL, Ph.D.
SECRETARY

Certified Mail No. 7004 1160 0003 2703 2220

Agency Interest No.2083

Sarah Thigpen
Responsible Care Leader
Union Carbide Corporation
St. Charles Operations, AP-2 Unit-Tank 2635
P. O. Box 50
Hahnville, LA 70057

RE: Permit Rescission, Permit No 1836TM2, Union Carbide Corp - St Charles Operations
Union Carbide Corp, CDS No. 2520-00001
Taft, St. Charles Parish, Louisiana

Dear Ms. Thigpen:

By letter dated February 23, 2007, Union Carbide Corporation, St. Charles Operations requested that the Permit No. 1836TM2 for the above referenced facility be rescinded.

Air Permits Division hereby rescinds the Permit No. 1836TM2, and acknowledges permanent closure of Union Carbide Corp's operations at the AP-2 Unit - Tank 2635.

Sincerely,

Chuck Carr Brown, Ph.D.
Assistant Secretary

3/12/07
Date

CCB:LND

ENVIRONMENTAL SERVICES

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

WWW.DEQ.LOUISIANA.GOV

Teri Lanoue

From: John Dyer
Sent: Wednesday, March 07, 2007 3:33 PM
To: Teri Lanoue
Cc: Dasheng Chu; Lourdes Dugas
Subject: Removal of UCC Bubble Permit from SIP

Air Permits just received a request to rescind the Bubble Permit for Union Carbide, St. Charles Operations, Taft, Permit No. 1836T (M-1), AI 2083, PER19870001. Lourdes Dugas is assigned this task. In the request dated 2/23/07, UCC also requested the Bubble Permit be removed from the SIP (listed under Union Carbide Facility in Hahnville, EPA approved 7/18/90, 55 FR 29205)).

The request stated the permit was originally issued 3/31/83 to exempt Tank 2635, which is in the AP2 Unit, from controls required by LAC 33:III.2103. The AP2 Unit was shut down 12/19/06. The grandfathered unit didn't receive an initial Title V permit in 2006, as scheduled, because UCC had plans early 2006 to shut down the unit permanently by end of 2006. In November 2006 we issued a variance to UCC for loading emissions associated with clean out of AP2 (PER20060021). On 1/5/07, we issued rescission letter for only other active permit associated with AP2 unit, 2652 (M-1), and acknowledged closure of AP2 (PER20010010). Permit 2652(M-1) was a Small Source Permit issued 4/18/01 for 3 replacement tanks at the unit.

If you need any further information to delete the bubble permit from the SIP, please advise. Thanks.

JOHN
Ext 3120